

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

NOTICE OF MOTION

-against-

RONNIE KING, et. al.,

14 Cr. 476 S1 (CS)

Defendants.

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PLEASE TAKE NOTICE, that upon the annexed affidavit of Frank Handelman, Esq., and all prior pleadings, papers and proceedings heretofore had herein, a motion will be made before HONORABLE CATHY SEIBEL in the United States District Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, on the date and time set by the Court or as soon as counsel may be heard for an Order:

1. Preserving defendant RONNIE KING's right to move for a severance and a separate trial from those defendants charged in the instant indictment with murder and conspiracy to murder; and
2. Preserving defendant RONNIE KING's right to move for suppression of statements of any co-defendants that the government may seek to introduce as evidence against Mr. KING pursuant to Crawford v. Washington, 541 U.S. 36 (2004) and Bruton v. U.S., 391 U.S. 123 (1968);
3. Preserving defendant RONNIE KING's right to move for suppression of any evidence the government seeks to submit governed by F.R.E. 404(b);
4. Permitting defendant RONNIE KING to join in the applicable motions made by co-defendants to the extent that they are not inconsistent with his rights and defense, nor

with the position taken by Mr. KING in these motions papers, and granting the relief requested herein;

5. Granting permission to seek further relief from this Court after receipt of additional discovery materials, if any; and
6. For such other and further relief as this Court may deem just and proper.

Dated: New York, New York
August 13, 2015

Respectfully submitted,



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To: AUSA Scott A. Hartman
AUSA Douglas Zolkind
Clerk of the Court